

Counsel listed on the following page.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT
SAN FRANCISCO DIVISION

PETER WRIGHT and MICHELLE
TRAME, individually, on behalf of all
others similarly situated, and on behalf of
the general public,

Plaintiffs,

vs.

ADVENTURES ROLLING CROSS
COUNTRY, INC., dba ADVENTURES
CROSS COUNTRY (ARCC), a California
Corporation, SCOTT VON ESCHEN, and
DOES 1 through 50 inclusive,

Defendants.

Case No. 3:12-cv-00982-EMC

**STIPULATION TO CONTINUE
DEADLINE FOR JOINT
SUPPLEMENTAL BRIEF**

Judge: Edward M. Chen
Ctrm: 5, 17th Floor

Current Deadline: July 15, 2013
Proposed Deadline: July 22, 2013

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1 TO THE COURT:

2 Plaintiffs PETER WRIGHT and MICHELLE TRAME (“Plaintiffs”) and Defendants
3 ADVENTURES ROLLING CROSS COUNTRY, INC., and SCOTT VON ESCHEN
4 (“Defendants”), by and through their respective counsel of record, herein agree and stipulate as
5 follows:

6 **RECITALS**

7 1. The Court has required that the parties meet and confer and file a joint
8 supplemental brief regarding the proposed class notice and consent form by July 15, 2013 (ECF
9 Doc. 134);

10 2. The parties are actively engaged in settlement discussions on issues that impact the
11 contents of the joint supplemental brief;

12 3. The parties respectfully request more time to meet and confer on the issues raised
13 by the Court in its Order dated July 8, 2013;

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15 **STIPULATION**

16 NOW, THEREFORE, based upon the foregoing statements, Plaintiffs and Defendants
17 hereby agree and stipulate as follows, subject to Court approval, that the deadline to file a joint
18 supplemental brief regarding the proposed class notice and consent form be continued to **July 22,**
19 **2013.**

20 IT IS SO STIPULATED:
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1 Dated: July 12, 2013

HIRSCHFELD KRAEMER LLP

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3 By: /s/ Kristin L. Oliveira

4 Reed E. Schaper

Kristin L. Oliveira

5 Attorneys for Defendants

ADVENTURES ROLLING CROSS

6 COUNTRY, INC., dba ADVENTURES

CROSS COUNTRY (ARCC) and SCOTT

7 VON ESCHEN

8 Dated: July 12, 2013

BRYAN SCHWARTZ LAW

9 RUDY EXELROD ZIEFF & LOWE, LLP

10
11 By: /s/ Bryan J. Schwartz

12 Bryan J. Schwartz

Attorneys for Plaintiffs

13 PETER WRIGHT and MICHELLE TRAME

[PROPOSED] ORDER

Pursuant to the parties' Joint Stipulation, it is so ordered that the deadline for the Parties to file a joint supplemental brief regarding the proposed class notice and consent form be extended to ~~July 22, 2013~~ July 19, 2013 by 4:00 p.m.

Dated: July ¹⁵ __, 2013

